

MARINO, TORTORELLA & BOYLE, P.C.

KEVIN H. MARINO
JOHN D. TORTORELLA
JOHN A. BOYLE

ROSEANN BASSLER DAL PRA*
EREZ J. DAVY*
MICHAEL J. FLYNN

ATTORNEYS AT LAW
437 SOUTHERN BOULEVARD
CHATHAM, NEW JERSEY 07928-1488
TELEPHONE (973) 824-9300
FAX (973) 824-8425
www.khmarino.com

875 THIRD AVENUE, 21ST FLOOR
NEW YORK, NEW YORK 10022
TELEPHONE (212) 307-3700
FAX (212) 542-3790
e-mail: jtortorella@khmarino.com
*OF COUNSEL

March 26, 2025

VIA ECF

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State St.
Trenton, NJ 08608

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080 | Custodian Update

Dear Judge Singh:

I write on behalf of Defendants Caremark Rx, LLC, Caremark LLC, and Caremark PCS Health, LLC (collectively, “CVS Caremark”) and Plaintiffs pursuant to the Court’s directive at the March 11, 2025 discovery conference to update the Court five days after the parties met and conferred. The parties held such a conference regarding custodian proposals on March 19, 2025. Plaintiffs provided a written follow-up to that conferral on March 20. CVS Caremark responded on March 25. The parties continue to discuss the matters addressed during the meet-and-confer and in their subsequent correspondence, and propose to update the Court no later than April 4, 2025, either by joint submission or simultaneous position statements. If that approach is acceptable, we respectfully request that you indicate the Court’s approval by so ordering this letter.

We thank the Court for its continuing attention to this matter.

Respectfully submitted,



John D. Tortorella

cc: Honorable Brian R. Martinotti, U.S.D.J.
All counsel of record

SO ORDERED:

Hon. Rukhsanah L. Singh, U.S.M.J.